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August 12, 2016

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Notice of Oral *Ex Parte* Communication**

*Office of Engineering and Technology and Wireless Telecommunications
Bureau Seek Information on Current Trends in LTE-U and LAA Technology,
ET Docket No. 15-105*

*Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband
Networks, IB Docket No. 13-213*

Dear Ms. Dortch:

On August 10, 2016, Kevin Robinson, Alex Roytblat, Jacob Jorgensen, and I, all of Wi-Fi Alliance, spoke by telephone with Edward Smith, legal advisor to Chairman Wheeler, and Ira Keltz, Deputy Chief of the Office of Engineering and Technology, regarding the above-captioned matters.

Wi-Fi/LTE-U

We informed the Commission that Wi-Fi Alliance continues to work, every day, on a single test plan designed to assess coexistence between Wi-Fi and LTE-U in indoor and outdoor environments. The process is exactly what the FCC and industry had in mind – an industry driven approach to a complex issue. LTE-U interests have been, and continue to be, an integral part of the development effort. In developing the test plan, we are relying on the broadly agreed definition of “fairness” established at the outset of this process, and we plan to continue to use that definition. We continue to expect that the test plan will be ready for use by neutral test labs next month. Continued FCC encouragement and support is useful to foster the cross-industry cooperation required to finalize the test plan. Wi-Fi Alliance is collaborating with 3GPP to ensure that fair co-existence exists between Wi-Fi and LAA technologies.

Globalstar

We noted that in his recent letters to members of Congress, Chairman Wheeler referred to Globalstar's potential deployment of a "terrestrial Wi-Fi network."^{1/} We asked the Commission to avoid using the term "Wi-Fi" to describe the Globalstar terrestrial low power service ("TLPS") proposal. Wi-Fi has a specific meaning and associated set of technical criteria developed since 1999. Wi-Fi Alliance created the term "Wi-Fi" to describe the user experience created through the use of Wi-Fi Alliance's certification program. As we have pointed out in this proceeding in the past, TLPS will not be Wi-Fi.^{2/} It would not interoperate with other Wi-Fi devices – an essential feature of consumer expectations of how Wi-Fi is used. Moreover, no work has been undertaken to incorporate TLPS into Wi-Fi.

Pursuant to Section 1.1206 of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket and provided to Messrs. Smith and Keltz. Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,



WI-FI ALLIANCE

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cc: Edward Smith
Ira Keltz

^{1/} See Letter from Tom Wheeler to The Honorable David B. McKinley, U.S. House of Representatives (July 27, 2016); Letter from Tom Wheeler to The Honorable Mike Thompson, U.S. House of Representatives (July 27, 2016) ("In light of these concerns, the draft Report and Order that I circulated included numerous conditions to help ensure that deployment of Globalstar's terrestrial Wi-Fi network would not have a significant detrimental impact on Bluetooth or other spectrum users . . .").

^{2/} See, e.g., Letter from Edgar Figueroa, President and CEO, Wi-Fi Alliance, to Marlene H. Dortch, Secretary, FCC, IB Docket No. 13-213 and RM-11685, at 1 (filed May 26, 2015) ("There are therefore no TLPS devices that are Wi-Fi devices, are Wi-Fi CERTIFIED™, contain Wi-Fi CERTIFIED™ chipsets, or are interoperable with other Wi-Fi devices. Consequently, it is inaccurate and misleading to assert, as others do, that creation of a TLPS will create additional Wi-Fi capacity."); Comments of Wi-Fi Alliance, IB Docket No. 13-213 and RM-11685, at 5-6 (filed May 5, 2014) ("Globalstar's network would use Wi-Fi 'like' technologies, including access points and client devices, but is not expected to be interoperable with devices certified by Wi-Fi Alliance as Wi-Fi CERTIFIED™").